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East Brunswick, New Jersey 08816


CHEMICAL LAND HOLDINGS, INC.

March 16, 2000

Chief, New Jersey Superfund Branch - 2
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866

Attention: Ms. Sharon Jaffess

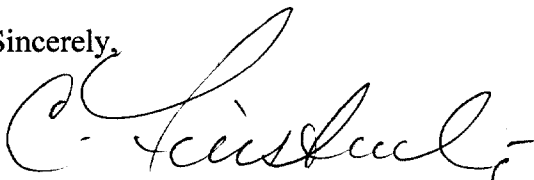
Subject: Monthly Progress Report No. 71
Passaic River Study Area

Dear Ms. Jaffess:

Submitted herewith are two (2) copies of Monthly Progress Report No. 71 for work performed during February 2000 at the Passaic River Study Area. This progress report has been prepared pursuant to Section X, Paragraph 64 of the Administrative Order of Consent between U.S. Environmental Protection Agency and Occidental Chemical Corporation, Index No. II-CERCLA-0117.

If you have any questions, please contact me at (732) 246-5851.

Sincerely,



Clifford Firstenberg
Project Manager
On behalf of Occidental Chemical Corporation
(as successor to Diamond Shamrock Chemicals Company)

(2 copies sent)

Attachment

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Ms. Sharon Jaffess
Passaic River Study Area
March 16, 2000
Page 2

- 2c: Section Chief
NJDEP-Bureau of Federal Case Management
401 East State Street -CN 028
Trenton, NJ 08625-0028
Attn: Jonathan D. Berg
- 1c: Chief, New Jersey Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866
Attention: Diamond Alkali Site Attorney - Passaic River Study Area

MONTHLY PROGRESS REPORT NO. 71
PASSAIC RIVER STUDY AREA
WORK PERIOD: FEBRUARY 2000

- A. Actions Taken Toward Achieving Compliance with the Order
1. Completed reconnaissance of CSOs.
 2. Evaluate results of reconnaissance and Trial Run sampling event.
 3. Develop recommendations for Full Scale CSO sampling program.
 4. Planning/scheduling of Spring ecological sampling program.
- B. Actual or Potential Violations and Other Problems Encountered:
1. None.
- C. Corrective Actions:
1. None.
- D. Validated Sampling or Testing Results Received or Generated During the Course of Implementing the Work:
1. None.
- E. Future Plans, Actions and Data Scheduled for March and April 2000:
1. Implement the protocol for evaluation of the potential use of beta-version SED2D model for the Passaic River Study Area upon receipt of updated model code from EPA.
 2. Revise Creel/Angler Work Plan upon receipt of comments from EPA.
 3. Evaluate results of CSO Trial Run and develop plan for Full Scale CSO sampling program.
 4. Pre-mobilization for Spring ecological sampling program.

MONTHLY PROGRESS REPORT NO. 71
PASSAIC RIVER STUDY AREA
WORK PERIOD: FEBRUARY 2000
(CONT'D)

F. Work Completion Estimates:

1. The RIWP is 100% complete.
2. The FSWP is 100% complete.
3. The Graphic Data Representation is 100% complete.
4. The Model Test Case Report is 100% complete.
5. The Screening-Level HERA is 100% complete.
6. The Alternatives Array Document is 35% complete.
7. The Ecological Sampling Plan is 100% complete (i.e., original submittal to EPA).
8. The Calibration and Verification Status Report is 100% complete (i.e., original submittal to EPA)
9. Creel/Angler Survey Work Plan is 100% complete (i.e., original submittal to EPA)

G. Delays Encountered or Anticipated and Mitigation Actions:

1. The evaluation of sediment transport for the future time frame, the stressed condition, can not be reasonably performed due to a flaw in the STUDH bed accounting algorithm. The description of the flaw and proposed mitigative actions were submitted to the EPA on August 29, 1996, September 3, 1996 and September 16, 1996. In addition, this delay was identified in Monthly Report No. 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51 and 52.
2. CLH submitted the revised test protocol for evaluation of the Beta Version (4.3) SED2D-WES computer model to EPA with a cover letter dated April 30, 1999. CLH will implement the revised test protocol upon receipt of the updated model code from EPA.